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8	Attorney for Plaintiff				
9					
10	UNITED STATES DISTRICT COURT				
11	DISTRICT OF NEVADA				
12					
13		Case No. 2:17-CV-02089-RFB-GWF			
14	RONALD R. JARAGOSKY, a single man,	STIPULATION AND ORDER			
15 16	Plaintiff,	TO EXTEND DISCOVERY (First Request)			
17	vs.				
18	FORD MOTOR COMPANY, a Delaware corporation; and JOHN DOE ENTITIES I-X, inclusive,				
19	Defendants.				
20					
21 22					
23	Pursuant to FRCP 6 and FRCP 26, the parties, through their respective counsel, hereb				
24	stipulate and agree to jointly move this court for	an Order to:			
25	Extend the deadline to amend pleading	gs and add parties from 02/15/18 to 04/02/18;			
26	2. Extend the deadline to file the interim status report from 02/15/18 to 04/02/18;				
27	3. Extend the deadline for Plaintiff to disclose initial experts from 02/15/18 to 04/02/18				
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- 5. Extend the deadline to disclose rebuttal experts from 05/16/18 to 07/02/18;
- 7. Extend the deadline to file dispositive motions from 09/13/18 to 10/29/18;
- 8. Extend the deadline to file the joint pretrial order from 10/05/18 to 11/19/18. In the event dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until 30 days after a decision of the dispositive motions.

•	October 10, 2017	Plaintiff's Initial Disclosure Statement
•	November 10, 2017	Ford Motor Company's Initial Disclosure Statement
•	January 12, 2018	Plaintiff's First Set of Non-Uniform Interrogatories to
		Defendant Ford Motor Company
•	January 12, 2018	Plaintiff's First Set of Requests to Produce to Defendant
		Ford Motor Company
•	January 26, 2018	Ford Motor Company's First Request for Production of
		Documents to Ronald R. Jaragosky
•	January 26, 2018	Ford Motor Company's First Set of Non-Uniform
		Interrogatories to Ronald R. Jaragosky
•	January 31, 2108	Submission of Protective Order

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II.

GROUNDS FOR DISCOVERY EXTENSION

The parties have had difficulty obtaining the most recent medical records for Plaintiff from the California facilities where Plaintiff is currently residing. He is essentially a quadriplegic and requires assistance in most of his activities of daily living. An administrator for Plaintiff's current facility was preventing Plaintiff from executing medical records authorizations which delayed the requesting of his most recent medical records. Plaintiff has had to subpoen these records which precludes Plaintiff from being able to comply with the current expert deadlines.

Additionally, the delays in obtaining HIPPA releases has affected both Plaintiff's and Defendant's ability to develop their claims and defenses warranting the need for additional time. The parties have been working cooperatively in trying to obtain the HIPPA releases, medical records and the scope of discovery.

III.

DISCOVERY THAT REMAINS TO BE COMPLETED

A. Plaintiff:

- 1. Plaintiff intends to notice the 30(b)(6) depositions of Defendant's corporate representatives;
- 2. Plaintiff will be identifying experts on both liability and damages;
- 3. Plaintiff may propound additional written discovery as needed;
- 4. Plaintiff will be deposing Defendant's experts once disclosed.

В. Defendant:

1. Defendant will be taking the deposition of Plaintiff and the percipient witnesses, including Ronald R. Jaragosky, Darby Jaragosky, Judy Ann

Jiworsky, Donald Patrick, NHP Officer Truscello, and Kevin Clickner, in California and Nevada March 12-March 16.

- Defendant will likely be deposing Plaintiff's experts on both liability and damages.
- 3. Defendant intends to perform inspections of the subject vehicle on February 26, 2018, February 28, 2018 and April 1, 2018.
- 4. Defendant may propound additional written discovery as needed.

IV.

PROPOSED SCHEDULE FOR COMPLETING DISCOVERY

The parties have agreed to extend all the discovery deadlines in this case by 45 days as set forth below:

- 1. Extend the deadline to amend pleadings and add parties from 02/15/18 to 04/02/18;
- 2. Extend the deadline to file the interim status report from 02/15/18 to 04/02/18;
- 3. Extend the deadline for Plaintiff to disclose initial experts from 02/15/18 to 04/02/18;
- 4. Extend the deadline for Defendant to disclose initial experts from 04/16/18 to 05/31/18;
- 5. Extend the deadline to disclose rebuttal experts from 05/16/18 to 07/02/18;
- 6. Extend the discovery cut off from 08/14/18 to 09/28/18;
- 7. Extend the deadline to file dispositive motions from 09/13/18 to 10/29/18;
- 8. Extend the deadline to file the joint pretrial order from 10/05/18 to 11/19/18. In the event dispositive motions are filed, the date for filing the joint pretrial

1	order shall be suspended until 30 days after a decision of the dispositive	
2	motions.	
3	DATED this 2^{nd} day of February, 2018.	
4	JONES WILSON, LLP SNELL & WILMER L.L.P.	
5		
6	/s/ Cory M. Jones Cory M. Jones, Esq. /s/ Joshua D. Cools Joshua D. Cools	
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12	Attorneys for Plaintiff RONALD R. JARAGOSKI Attorneys for Defendant FORD MOTOR COMPANY	
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15		
16	Ronald Jaragosky v. Ford Motor Compo Case No. 2:17-CV-02089-RFB-GV	ıny WF
17		
18	<u>ORDER</u>	
19	IT IS SO ORDERED this 5th day of February, 2018.	
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21	George Gel 1	
22	UNITED STATES MAGISTRATE JUDGE	-
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1	Prepared and Submitted by: JONES WILSON LLP
2	JONES WILSON LLP
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4	/s/ Cory M. Jones Cory M. Jones, Esq.
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